1:09CV0275 Sec P

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FEB 1 7 2009

A COMPLAINT UNDER THE CIVIL RICHTS ACT 42 U.S.C. section 1983

UNITED STATES DISTRICT COURT
Western DISTRICT OF LOUISIANA

Durrel Grant LeDee	326719
	INMATE(DOC)NUMBER
(Franches de C.)	
(Enter above the full name of each Plaintiff in this action.)	

VERSUS

Limothy Wilkinson, Angel A. Martin, Nicole Walker, Unit Mar. Hardwell, Case Mars.

Triplette, L. Shephard, Pat Thomas, Monatteyse, Linda Steele, Linda Ramsay,

Melody Turner, Lisa Coleman, RNA. Woods, Jounne Smith, Dr. Pacheco, Winn Correctional Center, Corrections Corporation of America, CEA-Contracted Medical Provider,

(Enter above the name of each James Le Blanc, Richard Stalder, Louisiana Dept. of Corrections

Instructions for Filing Complaint by Prisoners Under the Civil Rights Act, 42 U.S.C. section 1983

This packet includes two copies of a complaint form and one copy of the pauper affidavit.

IF YOU ARE A PARISH PRISONER, you must file an original and a copy of your complaint for each defendant you name. For example, if you name two defendants, you must file the original and two copies of the complaint. You should also keep an additional copy of the complaint for your own records.

IF YOU ARE A D.O.C. PRISONER, you must file an original and one copy of your complaint. If the defendants are still employed by the Department of Public Safety and Corrections, only one service copy is needed. Otherwise, you must supply a copy of the complaint and the service address for <u>each</u> defendant no longer employed by the Department of Public Safety and Corrections.

All copies of the complaint must be identical to the original

The names of <u>all parties</u> must be listed in the caption and in part III of the complaint <u>exactly</u> the same.

In order for this complaint to be filed, it must be accompanied by the filing fee of \$150,00. In addition, the United States Marshall will require you to pay the cost of serving the complaint on each of the defendants.

If you are unable to pre-pay the filing fee and service costs, you may petition the court to proceed in forma pauperis. For this purpose, a pauper affidavit is included in this packet. You must sign the affidavit, and obtain the signature of an authorized officer certifying the amount of money in your inmate account. If pauper status is granted, you will be required to pay an initial partial filing fee and thereafter, prison officials shall be ordered to forward monthly payments from your inmate account until the entire filing fee is paid.

You will note that you are required to give facts. THIS COMPLAINT SHOULD NOT CONTAIN LEGAL ARGUMENTS OR CITATIONS. ALSO, DO NOT INCLUDE EXHIBITS.

When you have completed these forms, mail the original and copies to the Clerk of the United States District for the Middle District of Louisiana, 777 Florida Street, Suite 139, Baton Rouge, La. 70801-1712.

Y	T.		•		•		
I.	Pr	·ev	าก	us	l a	WS	uits

Previous Lawsuits
A. Have you begun other lawsuits in state or federal court dealing with the same Facts involved in this action or otherwise relating to your imprisonment? Yes () No ()
B. If your answer to A is yes, describe each lawsuit in the space below. (If there is More than one lawsuit, describe the additional lawsuits on another piece of paper, Using the same outline.)
1. Parties to this previous lawsuit
Plaintiff(s): Dandagentinophynalikassonyustelonistangy Dorrel Grant Ledee
Defendant(s): Lt. Lone, Timothy Wilkerson, State of Louisiana
2. Court (if federal court, name the district; if state court, name the parish): U.S. District Court, Western District of Louisiana (Alexandric
3. Docket number: 1:06-cy-01333-000-30K
4. Name of judge to whom case was assigned: Honorable Dee D Drell
Referred to: Magistrate Judges James D. Kirk
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still Pending?):

C. Have you had any previously filed federal lawsuits or appeals, whether or not Related to the issues raised in this complaint, dismissed by any federal court as

Date of filing lawsuit: 07/19/06

Date of disposition: 11/03/06

6.

7.

F	rivolous, malicious, or for failure to state a claim for which reflecent be granteur Yes (✓) No ()
If Yo	your answer is yes, list the civil action numbers and the disposition of each case. Ou must identify in which federal district or appellate court the action was brought.
	1:06-C4-01333-000-JOK
	Failure to State a claim
II. P	lace of present confinement: Winn Correctional Center
A	. Is there a prisoner grievance procedure in this institution? Yes (✓) No ()
	Did you present the facts relating to your complaint in the state prisoner grievance rocedure?
	Yes (✓) No ()
C.	If your answer is Yes:
In	Identify the administrative grievance procedure number(s) in which the claims raise this complaint were addressed. WNC-2001-1510, WNC-2008-646, WNC-2008-288 NNC-2008-1408, WNC-2008-82 (WNC-2008-1409-Lost Property Claim*08-081) What steps did you take? I filed A.R.P.'s which were either denied or rejected and then i appealed them to the Second Step in which ney were denied What was the result? They were either denied or rejected
D.	If your answer is No, explain why not:
	Parties (In Item A below, place your name in the first blank and place your present address In the second blank. Do the same for additional plaintiffs, if any.) A. Name of plaintiff(s) Danel Grant Ledee Address Wine Correctional Center-DogWood C-2, P.o. Box 1260, Wine field, La. 71483-1260 In Item B below, place the full name of the defendant in the first blank, his official Position in the second blank, and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of any additional Defendants.
	B. Defendant imothy Wilkinson at Winn Correctional Center C. Additional Defendants: Angel A. Martin, Warden Winn Correctional Center. Nicole Walker, Chief of Unit Mamt Winn Correctional Center. Ms. Hardwell, Housing Unit Mar. Winn Correctional: Example Ms. iriplete, Case Mar. Winn Correctional Center: L. Shepherd, Works at another prison: Pat Thomas, Medical Director Winn Correctional Center: Monya Heyse and Linda Steele A.R.P. Screening Officers Winn Correctional Center: Linda Romsay, A.R.P. Reviewing Officer Louisiana Dept. of Corrections: Melody jurner. Managing Director Division III Corrections Correction of America.

Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much apace as you need. Attach extra sheets if necessary.)

Staph Infection: On OTHIOL plaintiff went o Dr. Pacheco-(Defendant) for Staph infection (Boil), injury went untreated on orlosor was Seen by Defendant) - Jounne Smith for Staph Infection (Boil) in his private area. She scheduled plaintiff to see (Defendant) - Dr. Pachecoon orlowlor on orlowlor (Defendant) - Dr. Pach eco again denied plaintiff treatment. Plaintiff informed Defendants) - Dr. Pacheco and Joanne Smith on these two visits and on his Sick Call Request dated or losloz thatthis Staph infection (Boil) was hurting him real bad and that he was in severe pain, but his cries were ignored. The injury went untreated On 10/10/107, plaintifffilled out a Sick Call Request to see (Defendant)-Dr. Pacheco to receive treatment for a Staph infection (Boil) on his leg. (Defendant) - Jounne Smith scheduled plaintiff to see (Defendant) - Dr. Pacheco

V. Relief:

State briefly what you want the court to do for you. Make no legal arguments. Cite no Cases or statutes. Attach no exhibits. Grant plaintiff a remporary Restraining order "(iRO)" so that he can receive outside Medical ireatment to find out what he's infected with and so that he can receive Medical irealment for this infection. Grant plaintiff a Preliminary injunction so that when

Plaintiff's Declaration:

^{1.} I understand that I am prohibited from bringing a civil action in forma pauperis if, while I was incarcerated or detained in any facility, I have brought three or more civil actions or appeals in a court of the United States that were dismissed on the prounds that they were frivolous, malicious, or failed to state a claim upon which relief may be granted,

unless I am in imminent danger of serious physical injury.

- 2. I understand that even if I am allowed to proceed in forma pauteris, I am responsible for paying the entire filing fee and any costs assessed by the Court, which, after payment of the partial initial filing fee, shall be deducted from my inmate account by my custodian in installment payments as prescribed by law.
- 3. I understand that if I am released or transferred, it is my responsibility to keep the Court informed of my whereabouts and failure to do so may result in this protion being dismissed with prejudice.

Signed this 109th. day of February	, 200 <u>¶</u>			
	Darrel D. L. Osp			
	Signature of plaintiff(s)			

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C. Additional Defendants: Lisa Coleman, LPN Winn Correctional
Center: A. Woods, RN; Winn Correctional Center; Joanne Smith,
RN Winn Correctional Center; Dr. Pacheco, Doctor Winn Correctional
Center; Winn Correctional Center, Corrections Corporation
of America; CCA-Contracted Medical Provider; James LeBlanc,
Secretary Louisiana Dept. of Corrections; Richard Stalder,
Secretary Louisiana Dept. of Corrections-Retired; Louisiana
Dept. of Corrections, Michelle Smith-Kennedy, Mr. Lewis

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Denial of Medical Treatment and Medical Care

IN Statement of Claims: on volvalor on volvalor, (Defendant) - Dr. Pacheco looked at the infection on plaintiff's leg and said if it gets bigger come back and see him this was not the firstime plaintiff went to see (Defendant)-Dr. Pacheco for this same infection on his leg. (Defendant) - Dr. Pacheco still did not do any thing and denied plaintifffreatment. Again, plaintiff informed (Defendants) - Jounne Smith and Dr. Pacheco how this infection (Boil) was hurting him real bad and that he was in severe pain; but again his cries were ignored and the injury went untreated it hurted real bad and it hurted when plaintiff worked on rolaglor, plaintifffilled out another Sick Call Requesto receive Medical irealmentfor the same infection on his leg that he wentto see Wefendant). Dr. Pacheco for on iolialoz. He was not seen by Wefendont). Dr. Pacheco, but was seen by Wefendant). Joanne Smith Again, the injury went untreated She told plaintiff that nothing could be done (Defendant) - A. Woods was in this room. She said the same thing. Defendant)- A. Woods said the infection was a Spider-bite. Plaintiff told (Defendant) - A. Woods thatthis Infection was not a Spider-bite because he had this same infection on orlivlow, in the same exact area and it just went away in 2007, it just reappeared in the same exact area but went away again; then it reoppeared again and this time it had got worse and it didn't go away Plain tiff then told (Defendant) - A. Woods that's how he Knew the infection was not a Spider-bite. Plaintiff also told Wefendant)-A. Woods that a Spider won't bite you in the same place twice (belendant). A. Woods then told plaintiff that the infection on his leg was a Hair infection. Plaintiffthen told (Defendant) - A. Woods; "How could this Infection on his leg be a Hair intection, when he doesn't have any hair in that area on his leg I thigh?

Plaintiff then told (Defendant) - A. Woods; "On first you said the Infection was a Spider-bite, now you're saying it's a Hair infection! (Defendant)-A. Woods didn't respond back to plaintiff's line of questioning. Plaintiff-then told (Defendant) I vanne Smith that (Defendant) Dr. Pacheco said the Infection was a cist and (Defendant) - A. Woods is saying two different things; who's right? (Defendant) - Joanne Smith told plaint iff that (Defendant) -: Dr. Pacheco was wrong and (Defendant) - A. Woods was right. (Defendant) -Jounne Smith, then released plaintiff and did not schedule plaintifffor a Pollow-up check up to see (Defendant)- Dr. Pacheco even though she . Knew that plaintiff was in severe pain because he advised her ofthis. Again, the injury went untreated on iolalor, plaintiff wentto his case Mgr. Defendant)-L. Shephard and advised her of his medical problem. He told her that he was in terrible pain and that medical was denying him treatment. He asked his Case Mgr. for her help. She told him that she would talk to her Supervisor (Defendant)-Nicole Walker about this on idalor, later on that day, plaintiff's Case Mgr. (Defendant) - L. Shephard called him into her office and advised him that shedidnHalk to O efendant)-Micale Walker yet because she was in a meeting; but as soon as she would get out of the meeting she would talk to her. (Defendant) - L. Shephard then asked plaintiff if he would let her look at his leg. He let her look at it and she said that it looked real bad and that it was not a Spider-bite. (Defendant)-L. Shephard said that she would talk to the warden (Defendant). Timothy Wilkinson about this Infection because it looked terrible and that plaintiff needed medical treatment on Montoz plaintiff ran into his case Mgr. (Defendant)-L. Shephard on Dogwood Walk-Wogwood is the Unithat Plaintiff resides in . A Honor Unit), and asked her if she talked to her supervisor Welendant)- Nicole Wolker and the Worden (Defendant) - Timothy Wilkinson yet? she said no. Plaintiff-told her that he was hurting real bad, in terrible pain and that he was trying his hardesHo work with the Medical Staff and Regular Staff butthey were not helping him. We fendant) - L. Shephard told plaintifftodo what he had to do. Plaintiff could oftook that statemento mean do anything. She did nottry to help plaintiff and by her making that statement she wasn't concerned about plaintiff's welfare and health on Moilor, plainliff was harting so bad. He was in so much pain He didnt think he could take the pain anymore. The night before he wanted to kill his self because of the pain to make it stop. Plaintiff ran into his Case Mgr. (Defendant)-L. Shephord again on this day while she was working Dogwood Floor-(Dogwood Floor is inside the Unitthat Plaintiff resides in). He told her that he was hurting so bad to where he could burely walk. Plaintiff had tears in his eyes. Defendant) - L. Shephard just looked at plaintiff and did not say anything. it hurted so bad for plaintiff to even walk or sit down He couldn't sleep that night because he was in so much pain on Morlor, the Infection on plaintiff's leg peppedopen and begin to drain. The infection was leaking Puss and Blood so bad also staining his underclothes to where he had to make his own bundages. The infection had such a terrible order like plaintiff never smelled before. Plaintiff had to puttissue on the wound and tape the tissue on his leg with scotch tape and he had to cut a pillow case in two and tie it on his leg to hold the tissue in place. He did this at 4:45 p.m. He was in so much pain to where he could barely walk Plaintiff wentto Kairo's later on that evening - (Kairo's is a Religious Organization from outside the prison that holds services inside the prison). His Spansor (A Spansor is a Member of Kairo's that's assigned to an Inmate) noticed that plaintiff was in terrible pain. He asked plaintiff what was wrong and plaintiff told him. He told plain tiff that he could'n't get involved but he would pray for plaintiff. He and plaintiff prayed together and he also told

plaintiff that when he would leave the prison that night and go back to the church he would ask his wife and the rest of the Members to pray for plaintiff. After Kairo's was over with that night at 9:00pm, plain tiff buildedup his nerves and courage to sneak down to the infirmary taking a chance of getting a write-up to get some bundages and medical attention. When plaintiff arrived at the infirmary he was threatened by the Correctional Officer that was working the infirmary walk that he would be written-up because he did not have a Dressing Change Pass-(this means if you have some Kind of open wound etc., Medical cleans it and dresses it with new bandages This is done every night). Plaintifffold the clo whatthe problem was and that she should not write him up because he had a serious medical need. She wanted to see plaintiff's injury. Plaintiff showed her his leg. She said that it looked terrible. She let plaintiff stay at the infirmary with no infractions in a Nurse that was on duty that night dressed the wound. When he took the bundage off of plaintiff's leg that plaintiff made it was soaked in puss and blood the infection would not stop bleeding the Murse stop draining the wound and said that he wasn't going to drain the wound all the way. After the Murse looked at the wound he wound he tried to say the same thing that - (Defendants) - A. Woods, Dr. Pacheco and Jounne Smith were saying; "The infection was a spider-bite!" Plaintiff told him the same same thing that he told the above three Defendants, but he didn't wantto hear that. He kept on insisting that the infection was a Spider-bite. He then gave plaintiff some bundages and a Dressing Change Pass, Plaintiff asked him to please give him something for pain but he would'nt. He told plain-Hiffto take some asprin. Plaintifffold him that he was already doing that butthe pain would not stop. The Murse Still told plaintiff to take asprin. On Illosloz plaintiff was up all night because he could'nt sleep because he was in so much pain all night. He thoughthat since the wound opened up that he was

not going to be in pain anymore. When he went to take his shower he changed the bundage it was socked in so much puss and blood. Plaintiff still has a scar today over a year later on his leg where the infection was when plaintiff changed the bandage it hurted even more to walk. Plaintiff even had problems getting to the Chow Hall on 12/09/07, plaintiff woke up in the morning and he was hurting in his private area. Righthere, he Knew whatthe problem was. The MRSA Staph Infection came back Plaintiff Knew exactly where to look because every time the infection comes back it appears in the same area in the exact same spot. it reappeared for the 4thor5th time in his private area. That's how he knows that he's infected with the MRSA Staph infection, and that the diseaselyerm is in his Bloodstream because it comes and goes on Izliolor, plaintiff was hurting even more than the day before. When he took a shower, he checked his private area for the infection it grew a little bit bigger than the day before and it was softer and more tender. He hoped and prayed thatthese people would give him medical treatment his time so he wouldn't have to suffer in pain like before on Islioloz, plaintiff sent (Defendant)-Pat Thomas, Medical Director a Requestform asking for her help advising her about his staph Infection in his private area. He told her that it hurts and is causing himpain. Plaintiff also told (Defendant) - Put Thomas that he needs to see the MD and go to the Hospital because he is infected with the MRSA Staph Infection. Plaintiff told (Defendant) - Pat Thomas that he was worried and scared to death about the safety and welfare of his health because people are dying because of this infection. Plaintifftold (Defendant)-Patithomas that it is hard for him to sleep at night because ofthis and that he was having nightmares about this. On 12/10/07, plaintiff sent (Defendant) - Angel A. Martin, Deputy Worden a RequestForm informing her that he is infected with the MRSA staph infection and that Medical is denying him Medical irentment. He told her that he needs to go to

the Hospital, that he is in pain and he needs medical attention. Plaintiff osked (Defendant) - Angel A. Martin for her help because she has the authority to help him. He begged her to help him Plaintiff (Defendant) - Angel A. Martin that he was scared to death about the safety and welfare of his health. He told her people are dying because ofthis Infection. Plaintifffold (Defendant). Angel A. Martin that it was hard for him to sleep at night because ofthis and that he was having nightmares about his. (Defendant) - Angel A. Martin did'nt do onything. She did'nt even look into the problem. She threw the problem on the Medical Director, Defendant) - Put Thomas. Defendant) - Put Thomas didn't do anything. she didn't even look into the problem. She threw the problem on (Defendant) - LPN Lisa Coleman. (Defendant) - Lisa Coleman said that plaintiff was seen in Sick Call. Plaintiff was seen in Sick Call but he did'nt recieve any treatment and the problem was getting worse. That's why plaintiff was asking for (Defendant) - Angel A. Martin's help. On 12/11/07, plaintiff filled out a Sick Call Requestfor the Infection in his private area, to see the MD and to go to the Hospital for trealment Plaintiff stated that he was in pain and hurting and that he had the MRSA Stoph infection that's in his Bloodstrom. On 12/11/07, plaintiff was still hurting as the day before. He didn't go to sleep until 1:27 a.m. He wished it would stop hulting so that he could get some real sleep. He knew that he might have a problem with this Infection (Boil) when he wentto Breakfastthat morning it hurted as he walked Then it hurted as he walked back from the chow Hall. On Islistor, plaintiff wentto Sick Call (Defendant) - Dr. Pucheco looked at the infection and said it was a Cist. He said the same thing about the infection on 10/16/07. Then when plaintiff proved to him that the infection wasn't a cist, he said that the infection was a Spider-bite on orlialob, plaintiff seen Oefendant) Dr. Pacheco for the same thing and he said the infection was a Hair-infection the infection went away a few months later which would be in December the infection : come back, now (Defendant) - Dr. Pacheco was saying the infection was a Cist. Dr. Pacheco Knew that plaintiff was in pain, that he was and is infected with the MRSA Staph Infection and that it had invaded his Bloodstream and he didn't and still has not given plaintiff something for pain, treatment or send him to the hospital Plaintiff again told (Defendant) - Dr. Pacheco that he was in serious pain. Dr. Pacheco said thatthere was nothing he could do aboutthat. Dr. Pacheco scheduled plaintiff to come back and see him in a few weeks to remove the Cist. Plaintiff should not of had to suffer in pain for a few weeks before he receives Medical Treatment. This is not the first time that plaintiff had this problem in different areas on his body that (Defendant)-*Dr. Pacheco diagnosed as a Cist. if plaintiff Keeps on having this problem so often that should tell (Defendant) Dr. Pacheco that plaintiff needs to go to the Hospital and get Medical Treatment. Plaintiff could really feel the pain when he walked and when he stood still He should'n't had to suffer like that. (Defendants). I samme Smith and Dr. Pacheco told plaintiff to put a towel on the infection (Boil) . They always tell plaintiff that and it doesn't any good or stop the pain." what Kind of Medical Treatment is that?" on Isliston, plaintiff was hurting real bud even worse than the day before. He felt a sharp pain. He was taking all the asprins that he could get his hands on eating them like condy and they were not working on 12/14/07, plaintiff didnt want to go through this pain anymore Hewas thinking of a way to make it stop. He thought about about Killing his self. He was hurting just like when he had the Infection on his leg. He hoped and prayed for the pain to go away. On Islistor, plaintiff was hurting just like the day before. He was worried and scored to death because he had another nightman about this infection that night. If this infection reaches your spinal fluid death can occur within

24-hours. That's why plaintiff is so worried and scared to death and why he is so depressed, stressed out and messed up mentality. These defendants Knows this and refuses to do anything about it or give plaintiff needed treatment. On 12/14/07, plaintiff was hurting even more now Hedidn't get any sleep that night. This medical situation was really stressing him out and depressing him. He didn't eat anything at all that day because he was so stressed and depressed when plaintiff gets depressed he can't eat. He decided if he would be feeling the same way the next day he would send a Requestform to Mental Health on 12/11/07 plaintiff was hurting real bad. He was having the exact pain that he had when he had the infection on his leg. It was hard for him to recilly walk, or even sit down. He didn't get any sleep that night and still hadn't ate anything ios of yet, because he was so depressed. This was the 2nd. day he did not eat. He sent a Requestform to Mental Health because he could'Attake the pain anymore and this Medical situation was aboutto drive him crazy and make him kill his self. He didn't know whatto do to make the pain stop. He figured the only way the pain would stop is if he would kill his self, but he really didn't wantto kill his self because he was afraid of gaing to hell. He tried Killing his self a few times before and he wasn't afraid to try it again But it was getting to the paint to where he didn't care anymore. He just wanted the pain to stop on 12/18/07, plaintiff still didn't get any sleep that night. Well, he got a little s leep. He fell asleep for about two hours. He had still not seen Mental Health yet. He still didn't have the desire to eat and he didn't care about eating anymore. Plaintiff decided to send Defendant) Nicole Walker a Requestform asking for her help because she has the outhority to help him. Plaintiff decided to drain the Bailon his own to make the pain stop on 12/19/07, plaintiff drain the infection Boil) and it went down a little bit and it was not hurting as much; but he was still hurting a little bit. it felt a whole lot better though from the previous pain. He finally got some sleep

and he finally ate something. He forced his self to eat something offor one of his trays. He was still not eating every meal though because he was Still depressed. Plaintiff received his Requestformback from Mental Health, Michelle Smith-Kennedy. She said she would schedule plaintiff and that it would be two weeks before she would see him. Plaintiffelt that he would probably Kill his self by then; but he got a call-outlago and see her the next day on 12/19/07, plaintiff talked to Defendant)- Nicole Walker. She osked him if everything was alright because of the mood he was in. Plaintiff asked her it she received his Requestform that he sent her about his Medical Condition. She said no! She asked plaintiff, "what was it about?" Plaintiff-fold her about his staph infection and that he had the MRSA Staph infection. He told her that he was hurting real bad, in severe pain and that Medical is denying him medical treatment. Mrs. walker got on the phone to call (Defendant)-Lisa Coleman because she said Mrs. Coleman would help him. Mrs. Coleman was nothere 30, plaintiff waited to see if Mrs. Walker was going to follow up on Mrs. Coleman for him. on 12/20/07, (Defendant) - Nicole Walker did notfollow up on Defendant)-Lisa Coleman for plaintiff. On 121 2010, plaintiff was still hurting and in pain like the day before. He decided to drain the Infection (Boil) a little bit more to relieve the pain the infection (Boil) was the same size as it was the day before on 12/22/07, the infection (Boil) went away and plaintiff was not hurting that much anymore on Islauloz, plaintiff received a Call-Out Pass to go see the MD (Defendant) - Dr. Pacheco to have what he claims to be a cist removed-(the infection (Boil) on plaintiff's leg), butthat was not necessary because the infection was gone. Plaintiff old (Defendant) - Dr. Pacheco that he needed to go to the hospital and that he should not have had to suffer in pain that long with no Medical Treatment. On oiloxlos, plaintiff received a Call-out Pass to see Dr. Wheal OF Mental Health because of he Stress and Depression that

this infection is causing him and because of the stress and Depression the Sexual Assault issue - (which will be filed with this Court in July) is causing him. Or wheat put plaintiff on two differently pes of medicine, now it has been increased to four different ypes of medication on ogliolog, plaintifffilled out a Sick Call for another Infection in his private area in the same area in the same exact spot where he always gets the infection in his private area. He was hurting real bad on oglislos, plaintiff wentto the infirmary for the infection in his private area (Defendant) - A. Woods examined plaintiff and said nothing was wrong with him Plaintiff tried to direct Mrs. woods to the spot where the infection was at but she wouldn't listen and she really could'n'thind the infection because she had gloves on that made it hard for her to find the infection and she really didn't wantto touch or feel on plaintiff which plaintiff doesn't blame her because plaintiff was embarrased too; butthat's her job Plaintiff was telling her it harted in the area where the intection was to helpher find the spot but she didn't wan Holisten, Plaintiff wentto Medical about a problem he's having losing weight in October-He can't remember the exact date and he lost his paperwork with the date on it and what was said and transpired on this visit due to all the medication Mental Health has himon. it's hard for thim to function normally and stay focused because of this medication. He would have to file Discovery to getthis date. Plaintiff asked Wefendant) - Dr. Pacheco to examine him and give him treatmentfor this infection in his private area. By this time it had spreaded to both sides Plaintiff told Dr. Pacheco that he is in pain and needs treatment. Dr. Pacheco againtold plaintiff the infections (Boils) were hair infections. The injuries again went untreated. Plaintiff is scared to fill out any more Sick Calls for this Infection because its in his private area and

the only people that examines you are female nurses and they may think that plaintiff is only filling out these Sick-Calls so these nurses could touch on him in his private area, and they will put him on lockdown for that He doesn't like these female nurses looking at his private area and touching on his private area. He asks them to let the MD do it because he's a male but they refuse too. on oil 29log, plaintiff woke up in pain. He was hurting on the right side on the top of his head, his right ear, and the right side of his entire face. He had a migrone headache and his right eye was hurting. it hurted if he touched the righttop side of his head, if he touched his right ear or stuck his finger in his right ear and it hurted when he swallowed, blow his nose or put his blue cap on his head Plaintiff thought this was a Dental problem since he was already having a Dental problem so he told Dr. Engelson. Dr. Engelson said it was not and that he would let Medical Know about this. On oilsolog, plaintiff woke up again in serious pain from the infection (Boil) on his head. It was huge and red and on his pillow case is a stain from where it was leaking. You can imagine what plaintiff was going through with just having his gums stitched up and with this infection (Boil) on top of his head on oxlorlog, plaintiff wentho his case Mgr. and informed her about the Infection Boil on top of his head. He showed itto her. She said it looks bad and she saw it leaking pass and blood. She documenated this in plaintiff's file. On oalogiog plaintiff woke up in pain again. He wentto chow for lunch to try and eat, but he couldn't. He saw his case Mgr. on DogWood Walk and informed her about this. He told her that he was in pain, dizzy and had a migrane headache due to the infection (Boil). On oploalog, plaintiff had a meeting with the Medical Director (Defendant) - Pat Thomas. He told her and showed her the infection (Boil) on his head, but she refused to give plaintiff treatment. On

orlowlog, plaintiff couldn't endure this pain onymore. He went to the key officer Mrs. Willams and made a Medical Emergency. He had to show her his head. It is showed it her. The Nurse said that she saw a little blood and swelling. Plaintiff told her that he needs Medical Treatment because he can't eat, or sleep. He told her that he is having migrane headaches, and his entire head hurts. The said that plaintiff couldn't see the MO today because he was too busy. She denied plaintiff treatment. When plaintiff got back to his Unit, he drained the wound because he couldn't take the pain anymore.

Lost Property = on 03/28/08, (Winn Correctional CCADD.O.C. Officials) came and searched Dog Wood Unit including C-2 Tier, the Tier that plaintiffis housed in. All of plaintiff's belongings that was in his footlocker which consisted of his Legal Work, Documents from different courts and his Bible Certificates were scattered between three different bunks and in the middle of the floor. The Tier looked as though a Cyclone had hit[i]" and "iffhe guards] had come in with one thought in mind and that being to completely tear the ficr apart." After the Shakedown was over with the guards made all the inmates stay in the t.v. room while they had inmates go down the isle with buggys and trash bags picking Lup all of the inmates belongings and personal property so that they could throw this property away. Most of plaintiff's property was lost. He could'affind them. Descriptions of items Lost: 1) Writ Application filed _in the Louisiana Supreme Court on Direct Review on Motion to Suppress, 2) Writ Application filed in the Louisiana Supreme Court on Post-Conviction, 3) Brief on Motion to Suppress filed in the Third Circuit Court of Appeals on Direct Review, 5) Third Circuit Motice of Judgment on allowlos and astellos,

6) Unpublished Judgment of the Court of Appeals denying Writs, along with a copy of the Third Circuit's Notice of Judgment, 7) Suppression Hearing Transcripts, 8) Sentencing Transcripts 27th Judicial District Court, 9) Boykin Transcripts 27th. Judicial District Court, 10) Police Reports 27th Judicial District Court, 11) Parts of Police Reports-15th. Judicial District Court, 12) Bill of Information 27th Judicial District Court, 13) 27 Bible Certificates, 14) Academic Transcript From Bible College. The result of this investigation on this Lost Personal Property Claim by (Defendant)-Nicole Walker resulted in it being denied which was on osloilor. She stated; "Loss, it any, not the result of staff negiglence. This is untrue. She knows that her Subordinates were negigient. Theirs inmates on this same Tier that lost property on this shakedown and CCA replaced it. On inmate lost two pair of Jeans, one pair of shoes and a radio and CCA replaced it. So, why couldn't plaintiff be compensated for his lost like the others. That's not including the percentage of the 1500 inmates and this compound that's property was lost, which was replaced by cen; which will be found out in Discovery (Defendant) - Nicole Walker also stated that the investigation has proved the claim invalid or unsubstantiated. Plaintiff can produce sworn statements to prove her otherwise. Plaintiff appealed Mrs. Walker's decision on oglasion, plaintiff received the result of his appeal from (Defendant) - Melody Turner. She denied plaintiff's appeal. She said she Supports the facility position-Other inmates were compensated for their loss, and the same thing happened with their loss why couldn't plaintiff be treated the same way and in a sense his lost property was more important and more valuable than theirs

Denial of Mental Itea Ith Medication: On oil oilog, plaintiff could'n Hake his Mental Health Medication anymore because it upsets his stomach and

makes him dizzy and sometimes it makes him throw-up before he eats. Plaintiff sent (Defendant)-Michelle Smith Kennedy a Requestion concerining the situation. He explained to her the entire situation dealing with his medication. Plainliff advised Ms. Kennedy that last year she issued him a pass so that he could eat before taking his medication because the Security Staff makes the inmates take their medication before they eat. Plaintifftold Ms. Kennedy that when he takes his medication before he eats it upsets his stomach, makes him dizzy and that he has already vomited twice Plaintiffold Ms. Kennedy thatthe Pass she gave him is in his Medical File. He asked her to please give him a copy of his Pass that week on oilollos, plaintiff really needed his medication because he was really stressed out and depressed and having all Kinds of crazy thoughts. He couldn't eat and he didn't sleep at all that night on oilo8108, plaintiff received a response back from (Defendant) Ms. Kennedy regarding his Medical Pass. She didn't wantho give plaintiff a copyshe put it off on Medical. She told plaintiff that he needed to talk to the Nurse at Pall Call about this (Pill Call is where the immates go to take their Medication). The Knew thatthese Nurses would'nd help plaintiff. On oiloglos, plaintiff ate a little bit so that he would'nt starve his self, but he really didn't eat much and he could'n't really eat. He needed his medication. He only sleptfor two hours that night. On oiloglos, plaintifftalked to one ofthe Pill Call Nurses like (Defendant) - Michelle Smith-Kennedy advised him to do. Her name is Mary Fobbs, the lady that issues out plaintiff's medication to him on her shift. Plaintiff-told Ms. Fobbs what Ms. Kennedy said about his Medical Pass. Plaintiff talked to Ms. Fobbs in DogWood Unit where plaintiff resides, when she was issuing out i.B. Shots that morning. She told plaintiff that she couldn't helphim. Olloglos, plaintiff wentto see Defendant) - Nicole Walker. He told her about his Medical Pass situation. She called (Defendant) - Michelle Smith-

Kennedy and talked to her for plaintiff. They started arguing about the sitwation. Ms. Kennedy tried to throw the problem on Mrs. Walker. Ms. Kennedy tried to tell Mis Walker to call (Defendant)-Pat Thomas and talk to her about it. Mrs. Walker told Ms. Kennedy that's not her area, Mrs. Walker told Ms. Kennedy that Mental Health is her area so she needs to call Ms. Thomas and talk to her about it and that was the end of the conversation. Meither one of these two Defendants wonted to take the responsibility to help plaintiff and they have the outhority to do so. Mrs. walker told plaintiff that she couldn't make Ms. Kennedy do what she doesn't want to do, but Mrs. Walker could oftalked to (Defendant) Pat Thomas or the Warden because she has the authority to do so. On that day plain-Fiff really needed his medicine because he thoughthat he was going to do something crazy on oilcolos, plaintiff sent (Defendant) - Pat Thomas another RequestForm about his Pass situation for his medicine Plaintiff told Ms. , Thomas that he is on Mental Health Medication. He told her that when he takes his medicine first which security makes them (inmates) do before they (inmates) , Eat, the medicine upsets his stomach, sometimes he throws up and it makes him dizzy Plaintiff told Ms. Thomas that he has a Medical Pass in his Medical File authorizing him to eat before he takes his medication. Plaintiff-told Ms. Thomas that (Defendant) - Nicole Walker talked to (Defendant) - Michelle Smith- Kennedy abouthis and Ms. Kennedy said that plaintiff and Mrs. wolker needed to talk to her (Ms. Thomas). Plaintifffold Ms. Thomas thatthis is the same type of medicine that he was on the firsttime when he was issued his Medical Pass and he is taking the medicine the same time he was taking the Medicine before when he was issued the Medical Pass. Plaintiff told Ms. Thomas that he needs to take his medicine because he's having all Kinds of crazy thoughts that are running through his head and he only ate once in three days. Plaintiff told ME. Thomas that he is really depressed and stressed out, he doesn't have the

desire to do anything anymore and that he has not slept at all that night on oiliolos, plaintiff sent (Defendant)-Michelle Smith-Kennedy another Request Form about his Medical Pass situation for his medicine. He advised her that he talked to the Pill Call Nurses as she advised him too, but he was told thatthey couldn't help him. Plaintiff told Ms. Kennedy that he needs his medication and that all kinds of crazy thoughts are running through his head. He told her that he ate only once in three days, that he is really depressed and stressed out and that he doesn't have the desire to do anything anymore and that he has not slept at all that night on vilulos, plaintiff received a response back from Defendant)-Michelle Smith-Kennedy concerning the problem with his medicution. The scheduled plaintiff to see her. Plaintiff forced his self to eat something that day. It wasn't much . He was so hungry. He was so depressed . He was having all kinds of crazy thoughts. He even thought about killing his self that night. On oilistos, plaintiff which are a little. He was about to kill his self that night, so he took a chance of getting wrote up and snuck and took his medication. It made him feel so good and relaxed on oilialos, plaintiff ate because he took another chance of getting wrote up and snuck and took his medication. He felt so much better. Plaintiff did the same thing on oilislos. Plaintiff should not have to break the rules to take his medication. He should not have to go through all these problems and changes when all they had to do was issue him a Medical Pass or give him a copy of his Medical Pass that's in his Medical File. On Ollislos, (Defendant) - Michelle Smith - Kennedy called (Defendant) - Pat Thomas and talked to her about this and Ms. Thomas told Ms. Kennedy that she would look into this. Plaintiff told Ms. Kennedy that Ms. Thomas was not going to do anything because he sent her a Requestform on oiliolog about the situation and she did not do anything. Plaintiff sent (Defendant) - Angel Martin a Requestform on 12/10/07 and Mrs. Martin threw the problem on (Defendant) - Pat Thomas

and Ms. Thomas threw the problem on Wefendant)-Lisa Coleman. Plaintiff sent Ms. Thomas a Requestion on oilidos. Ms. Thomas again threw the problem on Defendant)-Lisa Coleman. All these times Ms. Thomas didnt do anything. On oilislos, (Defendant)-Michelle Smith-Kennedy called the chaptain and asked him ifthere was a Dictthat Medical could give plaintiff since he was indigent (no funds in his account) meaning some type offood to have on hand before he takes his medicine and he said yes. So, Ms. Kennedy said that she would talk to Ms. Thomas about this; but she never did. Ms. Kennedy told plaintiff to send Ms. Thomas a Requestform about his which plaintiffdid on oilivlos. On oilivlos, plaintiff sent (Defendant) - Pot Thomas a Requestform about the situation with his medication He informed Ms. Thomas that he talked to (Defendant)-Michelle Smith-Kennedy and she talked to the chaptain and he recommened that since plaintiff is indigently ask the Medical Dept. to put him on a special Diet so that he could have something to eat before he takes his medicine On oiliblos, plaintiff ate some food. He took another chance of getting wrote up to take his medication. He felt real good the was finally getting some sleep and he was not having any crozy thoughts on oilirlos, plaintiff couldn't take his medicine because he would of had to sneak past security again, butthis time Security was watching too closely; so this time plaintiff couldn't get in. on oilieloz plaintiff filed an A.R.P. concerning the problem he was having with being denied his Mental Health Medication. on oilest or, plaintiff sent (Defendant)- Angel A. Martin a Requestform about the problem he's having with taking his medication Plaintiff told Mrs. Martin that Security makes the inmotes take their Medication before they eat. Plaintifftold Mrs. Martin that if he takes his medication before he eats, it upsets his stomach, makes him dizzy and sometimes makes him vamit. Plaintiffold Mrs. Martin that last year when he was taking his medication (Defendant) - Michelle Smith-Kennedy issuet

him a Medical Pass to eatfirst so that he would be able to take this same medication. Plaintifftold Ms. Martin that Wefendant) - Pat Thomas is giving him problems with trying toget a Copy of his Medical Pass that's in his Medical File or a Medical Pass period and that he needs to take his Medication because he was not eating, or sleeping, he was having all kinds of crazy thoughts, and all Kinds of nightmares. Ms. Martin never responded back to the Requestform. Plaintiff couldn't sneak past Security to take his medication because Security was watching too closely. On orlailos, plaintiff got a chance to sneak past Security to take his medicine. He felt a whole lot better. He got a response back from the requestform that he sentto (Defendant) - Pat Thomas, but s he didn't answer the requestform as always. She sent he requestform to Wefendant)-Lisa Coleman Mrs. Coleman denied plaintiff his Medical Pass to be able to take his medication and a Special Diet because she said i Hakes Meds at least 30 mins to dissolve and that plaintiff goes to the Chow Hall right after taking Meds. She was wrong because sometimes the Inmates has to wait in line for 5 mins, sometimes 10 to 15 mins; when they wipe the serving line down or when there's along line. Sometimes, the line be outside the door on the prison walk, and by then the medicine has dissolved and has begin to take effect. Mrs. Coleman can't really tell how fastthis medicine dissolves in plaintiff's body and how it affects him; so she should of not have denied him his Medical Pass or Special Diet on that judgment. Plaintiff did a trial test on one offhe Pills on how fast it dissolves and it starts to dissolve from the start of one minute and in ten minutes its almost completely dissolved if not dissolved all the way. Plaintiff still had not heard anything from the request form, that he sent to Wefendant) - Angel A. Martin on oil istor as always. on oilaalos and oilaalos, plaintiff got a chance to sneak past Security totake his medicine. It made him feel so good. On oil 24/08, plaintiff got a response

back from the Requestform that he sentto (Defendant) - Pat Thomas about his medication. i Hook 14 days for a response. That's sad. Plaintiff could of killed his self by then instead of Ms. Thomas responding to the Requestform she sent itto Defendant) - Michelle Smith-Kennedy. Every body is throwing this Medical Problem on someone else, no one wants to deal with the issue. Ms. Kennedy said that she has notified Medical ofthis issue, for plaintiff to consider, (can you believe that she said for plaintiffto consider) putting in a Sick-Call to talk to the MD. Defendant)-Patihomos puthe problem on (Defendant)-Michelle Smith-Kennedy and Ms. Kennedy putthe problem right back on Medical and she told plaintiff to deal with it his self. Everybody threw this problem on someone else again. Now, they threw the problem on plaintiff like they always do. Plaintiff couldn'ttake his medicine because Security caught him and turned him around. on oilastos, plaintiff could'intsneak past Security to take his medication. He really needed it because he was so depressed. He could'nt eat at all that day on or lactor, made ortantor, ortantor, and ortantor; plaintiff couldn't sneak past Security to take his medication. Now, it was really bothering him. He was not getting any sleep. He was sleeping on and off, a few hours each night. He was having terrible nightmares when he would finally fall to sleep. Plaintiff doesn't have any nightmores when he takes his medication. Plaintiff was so depressed He just didnt know whatto do anymore. He still didnt eat anything, but he dranked alot of water Plaintiff was so depressed on oilaslos, he forgot it was his birthday. on 01/30/08, plaintiff put in a Sick Call like Defendant) - Michelle Smith-kennedy told him too, because he thought that he was losing control of his self and life completely. Plaintiff was thinking about Killing his self again. He decided that if he didn't get a chance to take his medication that day, he was going to Kill his selfthot night. Plaintiff got a chance to sneak past Security to take his medicine it was hard but he did it. He had to sneak around five times but

he made it Plus he ate. He felt so good Plus , he was on the Call-out the next day to go to the infirmary for the problem he was having with his medication on oil-. 31/08, plaintiff went to the infirmary for the problem he's baving with his medication. what a big help that was. it really depressed him and stressed him out. Nurse Burks and Nurse R. Keiffer tried to get plaintiff his Medical Pass, but Defendant)-Or. Pacheco didn't want to give itto plaintiff. Ms. Burks reviewed plaintiff's Medical file and saw the Medical Poss was in it and the Order for it. She said, she doesn't see why Defendant)-Dr. Pacheco should'nt give plaintiff a copy ofthat Pass or another Pass. Nurse R. Keiffer said the same thing. They said, all Octendant) - Dr. Pacheco had to do was write plaintiff an Order for a new pass, but the Dr. Pacheco didn't wanto. Ms. Keiffer was so confident that Dr. Pacheco was going to give plaintiff the pass to where she filled out one for plaintiff before she even to Iked to Dr. Pocheco. All she needed was his okay. Ms. Keiffer referred the problem for Dr. Pacheco to review, because Dr. Pacheco said that he wanted to review plaintiff's Medical File before he issues plaintiff the Medical Pass. Plaintiff wanted to cry when he was denied his Medical Pass again for the eight consecutlive time, because he really thoughthat he was going to getthe Medical Pass the way Ms. Burks and Ms. Keiffer was talking because he really needed his medicine. . When plaintiff doesn'ttake his medication for days in a row he gets sucidial thoughts. Plaintiff didn't getto take his medication because he couldn't sneak past Security on oxloilos, plaintiff couldn't sneak past Security to take his medication. As soon as he crept around the corner he got caught. He was told to go to his Unit or he would get a write up on oaloalos, plaintiff got a chance to sneak past Security to take his medication. He fell so much better. On oaloalos, oaloalos, and oxloslos; plaintiff couldn't sneak past Security to take his medication. Helelt so sad and depressed on oxlowlos, plaintiff got a chance to sneak past Secwrity to take his medicine on orlandos, plaintiff got a chance to take his medicine.

He tolked to the Correctional Officer on duty. He was kind enough to let plaintiff take his medication, but he told plaintiff that he couldn't do it again unless plaintiff had a Medical Pass. On ozlooloo and ozlooloo, plaintiff couldn't sneak past Security to take his medication. He hates that because he hates feeling sad and depressed. He didn't have the desire to eat anything and he wasn't getting any sleep again on obtiolog, plaintiff got a chance to sneak past Security to take his medication. He got another inmate to distract the Correctional Officer on duty and he snuck in . That's sad . Plaintiff should not of had to do things like thatto be able to take his medication. on oalulos, plaintiff couldn't sneak past Security to take his medication (Defendant) - Mr. Lewis of Mental Health colled plaintiff to his office and asked plaintiff why he was nottaking his medication on some days. Plaintiff told Mr. Lewis why and he said that he would talk to Medical about this, but he never did. Plaintiff told Mr. Lewis that he needs his medicine real bad because when he doesn'ttake his medicine for days in a row he has sucidal thoughts, he doesn't have the desire to eat, gets very depressed, stressed and sad Plaintiff also told Mr. Lewis when he is not able to take his medication he is not able to sleep, he has nightmares, see's things and hears things - on oalialos, plaintiff did'nt get a chance to sneak past Security to take his medicine when he tried Lt. Davis-at. Davis is a Capt. now) turned him around. on oalis los, plaintiff got a chance to sneak past Security to take his medication. He felt a whole lot better on orthogonaliston, oalulos, oalistos, oalistos, and oalistos; plaintiff didnt get a chance to sneak past Security to take his medication. He really needed it because he was so depressed He had not eaten anything in days. it was really bothering him. He was not getting any sleep and he was so depressed. He just didnt know whatto do anymore. He thought that he wanted to die on o2/20/08, plaintiff sinally received a Medical Pass to eat before he takes his meds. in fact he received a

total of three Passes. Thank God for that. The only problem with this picture is that plaintiff received these Medical Passes today and (Defendant) Lisa Coleman issued plaintiff a Medical Pass on oxlinlos but he did not receive it until today.

Continue From Denial of Medical Treatment and Medical Care

on oalulos, plaintiff started having pain again in his private area. Righthen and there he Knew what it was He went to the shower and checked his private area and he noticed the Infection came back. He keeps on telling Medical time after time that he's infected with the MRSA Stap infection and that proves it on oalialos, plaintiff was hurting real bad and in terrible pain He filled out a Sick Call to see the doctor. On oalislos, plaintiff was not put on the Call Outfor Sick-Call. That's sad. Medical see's that these Infections Keep coming back, and that plaintiff is hurting, in terrible pain and they didn't want o give plaintiff Medical Treatment again. So, plaintifffilled out another Sick-Call on oxlidles plaintiff wentto Sick Call for the Boillinfection. Nurse Burks said that it was a Cist. Plaintiff Knew thatthey were going to say that They always do. Plaintiff didn't get a chance to see the MD. He had to wait until the next week. What a shame. Plaintiff told Nurse Keiffer that he was in terrible pain and that he needed to see the MD today. The would'nt let him. (Defendant) - Dr. Pacheco was also supposed to review plaintiff's Medical file since oil zilos for the problem he was having with taking his medication. Plaintiff did not hear anything since today because he asked the Nurse to look into his file and tell him what Dr. Pacheco said. He had already made his decision and did not notify plaintiff. He said that there was no need to change plaintiff's eating patterns itat's a crazy conclusion because you can't change the eating patterns overhere. Plaintiff needed his Medical Pass not a change in eating patterns. Anyway, Dr. Pacheco denied plaintiff

his Medical Pass to eat before he takes his Medication. On oalaolo8, plaintiff was called to see (Defendant). Dr. Pacheco over a week later after he filled out a Sick-Call for the Boill infection Dr. Pacheco did not examine plaintiff or give him any Medical Treatment. Plaintiff told Dr. Pacheco that he was in severe pain and needed Medical Treatment.

No. B-05-005, etc. "Administrative Remedy Procedure"

(Defendants)-Monya Heyse, Linda Steele, i. Womack and Linda Romsay processes, accepts and rejects the A.R.P's thatthey want to when they feel like it on 1128107, Plaintiff filed on A.R.P. against Dogwood Case Mgr. Shephard. The dropped the A.R.P. in the A.R.P. drop box at exactly 7:00 a.m. Lateron that day when plaintiff entered Dog Wood Unit on his way back from lunch Ms. Shepherd was sitting in Dog Wood Key. She called plaintiff to the Key and told him that she needed to talk to him. Plaintiff asked her what about. She suid, you wrote me up. you're suring me. Plaintiff asked her how did she know that he filed on A.R.P. against her. She said, the front office called me and told meto resolve this A.R.P. Plaintiff told her that the front office was not supposed to do that they were not supposed to inform you about this A.R.P. not just yet, not 30 soon; because i already have on A.R.P. pending that's still in the First Step. Plaintiff told her that the front office vio lated D.o.c. Policy because they were supposed to backlog that A.R.P. until the first one has been resolved on the Second Step Level. Again, on this same day; plaintiff was on his way back from the infirmary and Ms. Shephard stopped him and begin to harass him and question him for a second time about the A.R.P. that he filed against her. After the conversation was over and didn't go her way she said thatthey would talk about it tomorrow. On 12/20107, plaintiff tiled an

A. R.P. against D.O.C. Maintaince Employee Ben Otwell for Sexual Harossment Mis Conduct. Atthis time plainliff had another A.R.P. currently in the system that was filed on volsilor. Plaintiff then filed a third A.R.P. on oilielos. The A.R.P. that was filed on notation was denied on the First Step Level on Illzolor. Plaintiff appealed the decision to the Second Step Level and it was denied on oil-30108. After all this took place the Defendant)- A.R.P. Screening Officer Mona Heyse was to start the procedure on the A.R.P. that was filed second on 12/20/07 against Ben DI well, but instead she placed this A.R.P. on the side and began the process on the A.R.P. that was filed third on allielos. She was not supposed to do that. She violated D.o.c. Policy. She is to process the A.R.P.'s in the order that they come on oblosion, plaintiff wrote Gefendant) - Mona Heyse seeking an explanation for this and she said that this A.R.P. is still under investigation, and cannot be processed until the investigation is complete. She knows that she con't setone N.R.P. on the side especially the one that was filed first and process another; the one that was filed second or third. In other words, she can't process and set aside the A.R.P.'s that she chooses too. Theirs a Policy she must go by. Wefendant)-Linda Ramsay Knows what Gefendant). Mona Heyse is doing and she's letting her do it and get away with it. Ms. Heyse said the A.R.P. contbe processed until the investigation is complete. That's whathe first Step is for when an A.R.P. is filed. you do your investigation in the First Step and you grant or deny relief according to the investigation, which leaves Ms. Heyse A5 days to do that. Plaintiff wrote the Dept. of Corrections - Internal Affairs Section on osliolo8 and informed them about this. He asked the Oefendant)- D.O.C. to order Oefendant)-Mona Heyse to start the process on this A.R.P. The D.O.C. sent this letter back to this prison. (Defendant) - Linda Steele sentthis letter back to plaintiff stating due to improper filing. The A.R.P. Handbooklet states that nothing in this procedure should serve to prevent or discourage an inmate from comm-

unicoting with the Warden or anyone else in the Department of Public Safety and Corrections. On 03/07/08, plaintiff wrote (Defendant) - Mona Heyse again about this matter. He informed her that she is violating his "Due Process" rights and "Access to Courts" rights etc. by not processing this A.R.P. she never respended back to this letter. (Defendants)- Tim Wilkinson, Monya Heyse, Linda Linda Ramsay
Steele, and the Dept. of Corrections was stalling and lor trying notto process this A.R.P. that's why they kept placing it on the side and that's why D.o.C. sent my letter back when i informed them about it and when i inquired about it. These above mentioned Defendants used an A.R.P. that plaintiff filed on rights rolation to help them in violating plaintiffs in order to help them to not process this Sexually Assault A.R.P. This A.R.P. that was filed on 10/31/07 was filed before the Sexual Assault A.R.P. which was on 12/20/07. After the process on the A.R.P. that was filed on solsilor was complete they were to start processing the A.R.P. that was filed on Islaolor, butthey stalled and delayed the process on the A.R.P. that was filed on 10/31/07. Plaintiff completed the Second Step on the A.R.P. that was filed on iolailor on ialoslor. (Defendants)-Mona Heyse, Linda Steele and iim Wilkinson the did not send the Second Step to Defendant)-Linda Romsay until Oilislob. Ms. Romsay Knew thatthis was a violation and she went along withit. On oil 25/08, plaintiff wrote (Defendant)-Mona Heyse. He told her that it has been 48 days since this A.R.P. has been in the Second Step Level. He told her that the Second Step Level on losts for 45 days and he asked her what was the status ofthis A.R.P. Ms. Heyse responded by saying; she doesn't have any control over headquaters decisions. But what plaintiff did'nt Know was that Ms. Heyse didn't send this Second Step to Headquaters until oil-15/08 which would of made it less than a week instead of 48 days-on oilsilos, plaintiff wrote Defendant). Mona Heyse stating; in the input Screen you listed that you received WME-2007-1510- Step 2 on oilistop Theres no way in this world

that can be correct. I had five days to respond from step 2. If you look atthe date on the envelope the A.R.P. came in and the date on step 2 that i sent you; oilistop is incorrect, you recieved Step 2 on 12/08/07. That's why D.o.c. is taking so long to process this A.R.P. you're saying that you recieved Step 2 from over a month after i signed for it. That's impossible because i would have not metthe 5day deadline . I would like to know why you processed step 2 that late and why all my A.R.P.'s are being mishandled. Ms. Heyse responded back by saying; "No, sic The screen listed the date 2 ad step was rec-occepted at D.D.C. I do not have capibilities to input dates on their screen. But what Ms. Heyse failed to state was that she delayed this A.R.P. and was the cause of it with (Defendant)-Linda Ramsay playing along on 02/27/08, plaintiff wrote the Dept. of Correctionsinternal Affairs Section stating; On 10/31/07, i filed an A.R.P. (2007-1510) it was denied on the first Step. i completed my Second Step on 12/08/07. The reason for this letter is because i am requesting the date that winn correctional Center submitted my Second Step Response to D.O.C. (Defendant) - Dept. of Corrections sent my letter back to this prison. Defendant)-Lindo Steele sent myletter back to me with a letter of her own. it stated; This was returned to me from D. D. C. Be advised the day we receive your requestfor a second Step weprocess iffor forwarding to D.O.C if you have questions you should send your reqwestto my office. Anything you send directly to the state will be returned tome Each time the Dept. of Corrections sent plaintiff's letters back they discouraged and prevented plaintiff from communicating with the Dept. of Corrs which is a violation offheir own Policy. on osliglos, plaintiff had to go to Deputy Worden im Morgan to make Defendant) - Mona Heyse process the Sexual Assault A.R.P. on Illiolo8, plaintiff filed on A.R.P. against DogWood Unit Mgr. and A.R.P. Screening Officers Manya Heyse and Linda Steele- all three Defendants). Defendant)-Mona Heyse rejected this A.R.P. saying it is repetitive in nature and being

addressed in another A.R.P. (2008-646). She should not have rejected this A.R.P. on those grounds. A.R.P. 2008-646 dealt with two Case Mgrs. running plaintiff out oftheir office etc. A.R.P. 2008-1408 dealt with Defendants). Mona Heyse, Linda Steele and Dogwood Unit Mgr. violating D.o.c. Policy by trying to get plaintiffto drop the A.R.P. that he filed against Case Mgr. Triplette after he had already completed the Second Step and sent itto D.D.C. Welendants) - Monya Heyse and Linda Steele held this A.R.P. for more than two weeks after plaintiff had already completed the Second Step just like they did once before with the A.R.P. that he filed on 10/31/07. Ms. Heyse was not supposed to address this A.R.P. because it was filed against her. on Illiolo8, plaintiff filed an A.R.P. against (Defendants) - Nicole Walker, Chiefof Unit mgmt. and Melody Turner, Managing Director, Division III of CCA for a Denial of Lost Property Claim. Wefendant) - Monya Heyse rejected this A.R.P. stating thatthis problem is not eligible for review thru the A.R.P. system because there are specialized administrative remedy procedures in place for this type of com. plaint; "Lost Property Claim." Plaintifffollowed these procedures, that's why he filed the A.R.P.; because in order for him to address the claimin Court he has to exhaust his "Administrative Remedies." Also, Ms. Heyse was not supposed to reject this A.R.P. anyway because it was against (Defendants) - Nicole Walker and Melody Turner. She also stated that it is postthe 90 day time limitfor filing. That was incorrect. Like she said, plaintiff had to follow the Specialized Administrative Remedy Procedures for this complaint; which he did. Then when he received an answer from ean which was on oglasion and if he was not satisfied then he would be able to File his A.R.P. which he did in less than ninety days. Plaintiff wrote Gefendant)-Mona Heyse a letter on illistor about the A.R.P. that she rejected that was against her, Dogwood Unit Mgr. Hardwell and Linda Steele and about the A.R.P. concerning the "Lost Property Claim" that she rejected. Plaintiff asked her to process these two A.R.P.'s. She didn't and she didn't respond back to the letter. on 11 holos, plaintiff wrote

Oefendant) - Mona Heyse another letter about these violations. The letter said; on Illoilos, I filed an A.R.P. with four incidents you rejected this A.R.P. because I requested a remedy for more than one (incident-a multiple complaint). you also said that if I wish to proceed to separate my claims-only one issue per requestfor A.R.P. The actions in denying this A.R.P. is arbitrary, without factual basis and lor reason, unconstitutional and a violation of D.o.c. Policy. I say that because I filed an A.R.P. on Illoslow with multiple complaints, more than one incident- (Denial of Medication and Lost A.R.P.) and it was accepted. I Filed an A.R.P. on 09/15/08 with multiple complaints, more than one incident- Wen ich of Medical Care and Violation of D.O.C. Policy - Dept. Regulation No. B-05-005, "Administrative Remedy Procedure)" and it was not rejected ifiled an ARP. on 11/28/07 with multiple complaints, more than one incident- Harassment, Failure To Perform Job Duties and Denial of Access to the Law Library) and it was accepted This is a total of four A.R.P.'s with multiple complaints, more than one incident that was accepted but you rejected WNC-2008-1372. Dept. Regulation No. 8-05-005 states that if an inmate submits multiple requests during the review of a previous request, they will be logged and set aside for handling at such time as the request currently in the system has been exhausted at the Second Step or until time limits to proceed from the First Step to the Second Step have lopse. I still have A.R.P.'s in the system. This A.R.P. should not have been processed until these pending A. R.P.'s has been resolved in the Second Step Level; and it should not have been rejected on those grounds because you previously accepted and processed four previous A.R.P.'s on the same grounds that you used to reject this one. i'm requesting that you please accept and process ARP WNC-2008-1372- (Ms. Heyse still did not accept and process this A.R.P.). I'm also dropping A.R.P. WNC-2008-869, Subject Code: 0703-incident Date orloaloB-Date Received orlorlos. Ms. Heyse did not respond back to this

letter. On oil 28/09, plainlift wrote Oefendant)-Mona Heyse another letter about these violations. The letter said; i wish to bring to your attention that on 12/30/08, i filed an A.R.P. for Denial of Medical Care and Rejection of A.R.P. - Retaliation against Dr. Engelson, Ms. Clark-Wental Asst.), (MNC) - Medical Dept., Winn Correctional Center, Corrections Corporation of America, (CCA)-Contracted Medical Provider, Lisa Coleman, Linda Steele and Mona Heyse. You sent this A.R.P. back to me useing "improper Procedures." you sentthis A.R.P. to Sgt. Lane. The A.R.P. was not in a sealed envelope sitting on Ms. Triplette's desk with Ben Otwell sitting next to Ms. iriplette's desk the man that I have a Sexual Assault Claim against the Confidentiality of this A.R.P. was ristated Under File Maintenance | Confidentiality: A.R.P's should be maintained in a specific area. None of the A.R.P. materials should houseware to anyone other than me, a direct party, or someone involved in the review process you told Sgt. Lane that the reason why you sent this A.A.P. buck to me because it did not have a D.o.c. ton it. you also told her to tell me if you and your Dept have to follow rules, I have to follow them too it seems like you made this issue a conflict, because in the past i've filed A.R.P.'s against you and Ms. Steele for notfollowing procedures, policy, and Dept. regulations in processing my A.R.P's. Ms. Heyse let me make it clear to you that I don't want any conflicts with you or your Dept. Personally, I respect you dearly because you're a person in authority. it's just that i stand up for my rights and i won't tolerate them being violated So, could you please don't judge me as a bad person because i'm not. So, please let's Keep this as Business and not Personal. So, let's just run this race as friends akay and see who wins. I intend to win. Ms. Heyse this is going to be a long, tuffrace From this day forward I'll start praying for you and your family, for blessings and yo'll safety. God answers my prayers. Hny way, after reviewing my files and the record; i noticed that you sentthis A.R.P. back to me that was filed on

12/30/08 and the one that was refiled on oilowlog. Why did you do that? You did not even Backlog this A.R.P. Why not Ms. Heyse? You processed this A.R.P. You wern't supposed to do that. You again violated D.O.C. Policy - 6 epartment Regulation No. B-05-005). You were a party in this Complaint. The entire A.R.P. was anapout on you rejecting my A.R.P. in which i'm secking Medical Care in Retaliation for a conflict that you believe in your mind exists between me and you and your Dept. which is nottrue. If on inmote registers a complaint against a staff member, that employee shall not play a part in making a decision on the request; (Dept. Regulation No. B-05-005). Ms. Heyse you know that you and your Dept. is under abligation and duty to follow policy, procedures and Dept. Regulation but y'all fail to do so. I'm requesting that your Dept. process the A.R.P. that was refiled on ollowlog; please? Please answer this letter to its fullest and the other one also. May Good Bless you and your family and keep y'all safe! Ms. Heyse never answered this letter and never processed this A.R.P. on 01/28/09, plaintiff wrote (Defendant) - Mono Heyse another letter about some more violations. The letter said; I would like to bring to your attention that on 12/17/08, I filed an A.R.P. for Harassment, Interference ofland Denial and inadequate Medical Treatment against DogWood Unit Mgr. Ms. Hardwell-Cone of the main parties) in the Complain / Suit, Dr. Engelson, Ms. Clark-(Dental Asst.), (WNC) Medical Dept., Winn Correctional Center, Corrections Corporation of America, (CCA) - Contracted Medical Provider and A.R.P. Screening Officer Linda Steele. you rejected this A.R.P. because you said it was a Multiple Complaint (Llegal pages I 16 bullets). I strongly disagree. The entire A.R.P. is based on Ms. Hardwell Harassing me by interfering with me seeking "Emergency Medical irentment" from Dental on 12/12/08, and once i gotto Medical for this "Emergency Medical ireatment" it was denied and inadequate. So, my question to you is how can this be a Multiple Complaint. Your decision simply is not correct, and it connot be sustained. It's one Complaint but with different parties. your

decision and findings does not support such a claim. Everytime, Ms. Hardwell or Ms. iriplette is a party or defendant in my A.R.P.'s theirs a problem. i also mentioned the statement that was made to me on ululos about Dental from your Subordinate Linda Steele Her statement dealt with the same thing about one of the reasons i was being denied treatment and on 12/17/08 Dr. Engelson mentioned the same thing that Mr Steele said. This can be proved in Discovery i refiled the ARP on oiloulos. After reviewing my files and the record, i noticed something. you sentthe N.R.P. book i refiled on oiloulos back to me. why did you do that? On the Backlog Form you putthat my Complaint was for Inadequate Dental Care-Connot Eat Therefore Connot take Mental Health Medication, but you forgotto state thatthe Complaint was also against Ms. Hardwell for Harassment and interfence in secking Dental ireatment which formed the basis of this Complaint. Why was she not included when she was one of the main parties? Why was Ms. Hardwell IcH out! Now, heres what i don't understand and what really caught my attention besides you sending the A.R.P. that was refiled back to me. On the Backlog form you inputed that this A.R.P was received in your office on 12/26/08 if you review the record and your files correctly you will notice that you are incorrect. I filed this A.R.P. on 12/17/08. Whenever I file on A.R.P. . I will be sentlayour office on the exact day-(date) that's on the A.R.P. or the next day; no later than that in time for the A.R.P. to be picked up and delicered to your office between 7:00 am and 8:00 am, the time the A.R.P's are picked up. if you review the record and your files you'll see what i'm saying is correct. So, my question to you is how did your office recieve this A.R.P. on 12/20/08 when it was in factfiled on 12/17/08? This date is simply not correct. The date of the Incident was 12/12/08 and the A.R.P. was filed on 12/17/08, so how did you come up with this incident Date of 12/23/08? INS Heyse, considering all the circumstunces in the processing of this A.R.P. that was filed on 12/17/00 and then refiled

on orlowle	ob is not a	ojectively rea	sonable.ih	ave presen	ted favorab	le findings
offacts!						

Questions

- 1) Why did you send the A.R.P. that was refiled on orlawloss back to me?
- a) Why was Ms. Hardwell left out when she was one of the main parties and formed the basis of the Complaint?
- in your office on 12/20/08?
 - 4) Why did you input on the Buckley that the incident Date of this A.R.P. was 12/23/06 when the incident Date was in fact 12/12/08 and the A.R.P. was filed on 12/17/08?

On oaloalog, plaintiff wrote (Defendant) - Mono Heyse another letter concerning more violations the letter said; i would like to bring to your attention that after reviewing my files and records violations were found that was committed by you and your Dept. First of all i would like to address the A.R.P. that was filed on Wholos against Correctional Officer Mrs. Supp and Correctional Counselor Syt. Lone for failure To Perform Lob Duties There is no Backlog on this A.R.P. and it was not processed at all by you A.R.P. Dept. I figured something was wrong with this A.R.P. but i never had time to review my files and records, but after doing so this was discovered Ms. Heyre, ccalooc Employees must obey all outhorized regwhations, policies, and procedures. Each employer must perform his her duties properly free of negligence so as to fulfill the purposes and responsibilities of their assignment. This is not being done by you or your Dept .- (Malfeance). Ms. Heyse, would you please process this A.R.P.? Why was this A.R.P. notfiled and processed? ion 12/17/08, you rejected was 2008-1578 because you said it was a Multiple Complaint, but WNC-2007-1610 was a Multiple Complaint. It was accepted and not rejected war 3008-646 was a Multiple Complaint. It was accepted and not re-

jected war 2008-1174 was a Multiple Complaint. It was accepted and not rejected WAC- 2008-1378 was a Multiple Complaint. It was rejected and not acc. epted. On 12 Inlog, I filed an A.R.P. but refiled it on orlowor It was a Multiple Complaint. It was accepted and not rejected. On Illoblob, I filed an A.R.P. it was a Multiple Complaint. It was accepted and not rejected. This is a total of seven A.R.P.'s with Multiple Complaints. Two ofthem were rejected and five were accepted. My point is, if i have to follow the rules like you told Sgt. Lane to tell me when you sent one of my A.R.P.'s back, then moom you have to follow them too you can't just process, occept and reject the A.R.P.'s that you want too when you feel like it. you and your Dep to mustfollow procedures, policy, and Dept. Regulations when processing these A.R.P.'s. you and i have been having this problem for a few years now. i brought it to you and you Department's attention and you still fail to address it. On 12/30/08, I filed an A.R.P. for interference | Denial and inadequate Medical Treatment and Harassment against DogWood Unit Mgr. Hardwell which formed the basis of this Complaint and is one of the main parties. I refiled this A.R.P. on oilowlos because of an error that you said i made. Ms. Hey'se, there is no backlog on this A.R.P. it was notfiled into the record or processed at all by your Dept. Would you please process this A.R.P.? Why was this A.R.P. notfiled or processed at all by your Dept? On 12130/08, i filed an A.R.P. for Denial of Medical Carel Rejection of A.R.P. Retaliation And months and your Subordinate Lindo Steele whereas y'all were two ofthe main parties. I refited this A.R.P. on orlands because of an error that you said I made. Ms. Heyse, there is no Backlog on this A.R.P. It was notified into the record or processed at all by your Dept. Would you please process this A.R.P.? Why was this A.R.P. notfiled or processed? On 12/30/08, I filed an A.R.P. for Denial of Medical Care | Rejection of A.R.P. | Retaliation against you and your Subordinate Linda Steele whereas y'all were two of the main parties. I refiled this A.R.P. on oiloblob because of an error you said that I made. Ms. Heyse, there is no Bucklogan

this A.R.P. it was notfiled into the record or processed at all by your Dept. Would you please process this A.R.P.? Why was this A.R.P. notfiled into the record or processed! On 12120/08, I filed on A.R.P. for Denial of Medical Care. This is the A.R.P. that you sent back to me useing "improper Procedures." You sent sentilis A.R.P. back to me thru Sgt. Lane. The A.R.P. was not in a sealed envelope sitting on Ms. irip. lette's desk with Ben Otwell sitting next to Ms. Triplette's desk the man that I have a Sexual Assault claim against. The Confidentiality of this A.R.P. was violated under File Maintenance | Confidentiality = A.R.P.'s should be maintained in a specific area. None of the A.R.P. materials should be given to anyone other than me, a direct party, or someone involved in the review process. You told Sat. Lane that the reason why you senthis A.R.P. back to me because it did not have a D.O.C. on it you also told her to tell me if you and your Dept. has to follow the rules, I have to follow them too, but on 12/23/08 i filed on A.R.P. for Denial of Medical ireatment and Mental Health Care. This A.R.P. did not have a D.O.C. on it and you accepted it. Ms. Heyse, you're processing, setting aside and rejecting the A.R.P.'s that you choose too. You con't do that. That's unconstitutional and violating D.O.C. Policy. If you review your files and records you'll see that there are other A.R.P.'s that you and your Dept. occepted that i filed without D.D.C. numbers. On Illiolog, I filed an A.R.P. for abuse and violation of D.O.C. Policy. There was no Backlog on this A.R.P. you said this A.R.P. was Repetitive in Nature and being addressed in A.R.P. * 2008-646 That's why yourejected it. i strongly disagree. This is unreasonable. You rejected this A.R.P. because it was against you, - (mainly you); your Subordinate Lindo Steele and DogWood Unit Mgr. Hardwell. A.R.P \$ 2008-696 was for Harassment, Failure To Perform Job Duties and Denial of Access To The Law Library. A.R.P. * 2008-1408 was for Abuse and violation of D.o.C. Policy. 30, could you please tell me how you came to the conclusion that A.R. P. * 2008-1408 was Repetitive in Nature and being addressed in A.R.P. * 2008-646? Ms Heyse, you were't supposed to address this A.R.P. Dept. Regulation No. 805-

005, "Administrative Remedy Procedure." if an inmate registers a complaint agciast a staff member, that employee shall not play a part in making a decision on the request. This is a violation of D.D.C. Policy, Procedures and Dept. Regulations. On 03 lorlo8, i filed an A.R.P. against you and CCA. you addressed this A.R.P. Ms. Heyse, the A.R.P. was against you you wern't supposed to do that and in doing so you rejected A.R.P. * 2008-1908 as well; because they were against you. On 11/01/08, I filed an A.R.P. against you and other parties in which you were a main party. Ms. Heyse, again you wern't supposed to address this A.R.P. You were a porty in this A.R.P. and in doing so you rejected it. on oglislos, i filed on A.R.P. against you and other parties in which you were a main party. You addressed this A.B.P. you wern't supposed to do that you were a party. Dut of 99.9% of the A.R.P's that ifile against you your Subordinates and your office; you address them and reject hem. Ms. Heyse, the only reason why i'm addressing my concerns to you about your Subordinates, you and your Office because these violations are affecting me. it doesn't matter tome what y'all do Frankly it's none of my business. But, as long as youll keep these violations up; you are hindering and is making it very hard for me to address my rights that are being vialated that I'm claiming in these A.R.P's to the Courts. Ya'll are violating my "Due Process Rights" and "Access to Courts Rights" and restricting them because I must exhaust my Administrative Remedy Procedures before I can redress my Grievances in the Federal Courts. you never answered my letters that i sentlo you on oil 28/09. Could you please address these letters and this one when you're notto busy and has time? Questions

1) why was the A.R.P. that was filed on Illiolog, notfiled and processed by your office?

2) Could you please explain to me how A.R.P. * 2008-1408 is Repetitive in Nature and

being addressed in A.R.P. * 2008-6467

- 3) Why was the A.R.P. that was filed on 12/17/08 and then refiled on orlowos, not filed and processed by your office?
- 4) Why was the A.R.P. that was filed on 12/30/08 and then refiled on 01/06/08, not filed and processed by your office?
- 5) Would you please process and file the N.R.P.'s that's being addressed in Questions 1,3, and 4?
- 6) Could you send me docementation of all A.R.P.'s filed by me that were Backlogged, Accpeted, Rejected, Disposition Date, Subject Code, Incident Date and whatthe Complaint
 was about since my arrival atthis facility?

Please answer this letter to its fullest. May God Bless you and your family and keep yo'll safe!

(Defendant) - Mona Heyse did not answer any ofthese letters.

Continue From Pq. 4

N. Relief: the Defendants conducts a search shakedown they won't damage, datroy, or otherwise abuse plaintiff's belongings and personal property through
willful acts or gross negligence. Grant plaintiff a Preliminary injunction
ordering Mona Heyse, Linda Steele, i. Womack and Linda Ramsay to follow Dept.
of Corrections Policy in processing plaintiff A.R.P.'s. Grant plaintiff a Preliminary
injunction ordering Mona Heyse tank her Dept. to process and file all A.R.P's that
plaintiff has filed. Grant plaintiff a Jury irial. Grant plaintiff nominal, compensatory, and punitive damages on all four claims filed. Grant plaintiff a
Preliminary injunction ordering the Defendants to improve Medical Screening
and Examinations and Sick Call Procedures. Grant plaintiff a Preliminary injunction
ordering the Defendants to correct the deficiencies that subjects plaintiff to grave

risks. Grant plaintiff a Preliminary injunction ordering the Defendant's to correct the inadequate Medical Administration and the A.R.P. Administration.

Grant plaintiff a Preliminary injunction ordering the Defendants to give plaintiff proper medical care in the future. Appoint Counsel to Plaintiff

02/10/09

Daviel D. Le Dec

Legal Mail,

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Pag. 0. Box 1260

Filed 02/17/09 1001: 612, La 71483-1260

Clerk of Court

United States District Court Mestern District of Louisiana

300 Fannin St., Ste. 1167 Shreveport, La. 71101-3083